

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

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CLERK OF COURT
WESTERN DISTRICT OF TENNESSEE

LESA R. TARD

(Name of plaintiff or plaintiffs)

v.

CIVIL ACTION NO. _____

Baptist Hospital-Memphis

(Name of defendant or defendants)

COMPLAINT UNDER TITLE VII OF THE CIVIL RIGHTS ACT OF 1964

1. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on the Court by 42 U.S.C. §2000e-5. Equitable and other relief are also sought under 42 U.S.C. §2000e-5(g).

2. Plaintiff, LESA R. TARD
(name of plaintiff)

is a citizen of the United States and resides at 870 N. Wood Shadows Ln.
(street address)

Cordova United States Tennessee
(city) (country) (state)

38018 901-409-1587
(zip code) (telephone number)

3. Defendant Baptist Hospital - Memphis
(defendant's name)
 lives at, or its business is located at 6019 Walnut Grove
(street address)

4. Plaintiff sought employment from the defendant or was employed by the defendant at
6019 Walnut Grove
(street address)
Memphis United States Tennessee 38120
(city) (country) (state) (zip code)

5. Defendant discriminated against plaintiff in the manner indicated in paragraph 9 of this complaint on or about April 17 2012 / Retaliation
(day) (month) (year) for Complaining to
Upper Management

6. Defendant filed charges against the defendant with the Tennessee Fair Employment Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about N/A
(day) (month) (year)

7. Plaintiff filed charges against the defendant with the Equal Employment Opportunity Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about 10th May 2012
(day) (month) (year)

8. The Equal Employment Opportunity Commission issued a Notice of Right to Sue, which was received by plaintiff on 21st May 2012 (Attach a copy of the notice to this complaint.)
(day) (month) (year)

9. Because of plaintiff's (1) ___ race, (2) ___ color, (3) ___ sex, (4) ___ religion, (5) ___ national origin, defendant

(a) ___ failed to employ plaintiff.

(b) ☒ terminated plaintiff's employment.

(c) ___ failed to promote plaintiff.

(d) ☒ *Complained to Corporate, Directo
Director of Human Resources and EEOC.

* The complaint of Intentional Infliction
Of Emotional Distress and the Assault Complaint
that was taken to the Director of Human
Resources.

10. The circumstances under which defendant discriminated against plaintiff were as follows:

Abuse of Authority and Outrageous conduct
that was done intentionally with reckless disregard
of the probability of causing emotional distress. This
resulted in suffering extreme emotional distress. I
was written up on numerous occasions without proper cause
or a thorough investigation. I also was suspended on
numerous occasions without cause or knowing the nature
of the suspension. I was giving terrible evaluations and was
told Baptist has their rules and [unclear] (my supervisor) had her own rules.
I was terminated 5 yrs ago by the same supervisor that [unclear] [unclear]
accused me over hearsay. [unclear] I have made every attempt in following
the chain of command and followed through, this resulted in my supervisor
assaulting me and later lead to my termination. The
everyday pressure of working in a hostile work environment cause emotional
distress.

11. The acts set forth in paragraph 9 of this complaint

- (a) ☐ are still being committed by defendant.
 (b) ☒ are no longer being committed by defendant.
 (c) ☐ may still be being committed by defendant.

12. Please attach to this complaint a copy of the charges filed with the Equal Employment Opportunity Commission, which are submitted as a brief statement of the facts supporting this complaint.

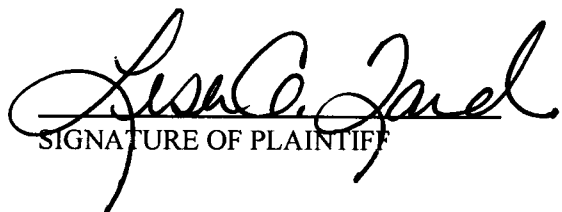
WHEREFORE, Plaintiff prays that the Court grant the following relief to the plaintiff:

- (a) ☒ Defendant be directed to employ plaintiff, or
 (b) ☒ Defendant be directed to re-employ plaintiff, or
 (c) ☐ Defendant be directed to promote plaintiff, or;
 (d) ☐ Defendant be directed to grant

grant full back pay, grant
compensatory damages for the humiliation, emotional distress,
and other damages, grant punitive damages for defendant's malicious
and recklessly indifferent conduct, grant all employment back

and that the Court grant such other relief as may be appropriate, including injunctive orders, damages, costs and attorney's fees.

13. I would like to have my case tried by a jury. Yes () No ()


 SIGNATURE OF PLAINTIFF

Case 2:12-cv-02722-SHM-egc Document 1 Filed 08/21/12 Page 4 of 4 PageID.14
benefits she would enjoyed had she not been discriminated
and retaliated against, grant Plaintiff expenses of
litigation, pursuant to the Title VII (for filing complaint)
grant Plaintiff all other relief the court deems
just and proper.

Respectfully Submitted August 21st, 2012

"Certificate of Service"

I LESTER TARD do hereby certify that a ~~true~~ true
and exact copy of the foregoing has been forwarded
to the following; This the 21st day of August 2012

United States District Court Clerk Western Divisional Office
167 N. Main Street
Room 242
Memphis, TN 38103

By: Lisa C. Janel
LESTER TARD / Plaintiff pro-se